

REMARKS

The Examiner rejected claims 1-4, 9-24, and 29-31 as unpatentable over Williams.

New claims are presented clearly distinguishing over Williams. These new claims have a respective generic method linking claim 33 and a respective generic device linking claim 52. Since it is believed that both of these generic linking claims are allowable over the cited Williams reference, all of the dependent claims dependent thereon should be allowable regardless of the previous restriction requirement. Note that the linking claims recite generically a continuous downward pressure. This downward pressure can be provided by a pad or by a positive air pressure. It is respectfully requested that any previous restriction requirement should be reconsidered in view of the generic linking claims and the allowability of these generic linking claims.

New method claim 33 clearly distinguishes over Williams at least by reciting spatially offsetting the pages of the successive second job with respect to the pages of the preceding first job, and mechanically fixing an uppermost page of the first job by a continuous downward pressure onto a top surface of said uppermost page of the first job after the offset stacking of the pages of the first job and during the offset stacking of all of the pages of the second job. In other words, the downward pressure onto the top surface of the uppermost page remains continuously during the stacking of all of the pages of the second job. This downward pressure is important since friction

is not sufficient to ensure that the top page of the first job is not displaced during the stacking of the pages of the second job.

The Examiner acknowledges that Williams does not have any mechanical fixing. Claim 33 now even more specifically recites that this mechanical fixing is by a continuous downward pressure onto the top surface of the uppermost page. Although Williams does have offset stacking by rotating about a vertical axis 28 his paper stacker wheels 24 to direct the pages either to the right or to the left for the offset stacking, he only relies on friction to ensure that the top page is not displaced during the stacking of the second job pages. This sole reliance on friction is addressed at column 3, lines 34-39. However, friction is insufficient and the method of claim 33 clearly distinguishes and has clear advantages over the Williams method where an actual continuous downward pressure is provided onto a top surface of the uppermost page. Because of the advantages of claim 33, it would not be obvious to provide the continuous downward pressure as recited in claim 33. Williams *teaches directly away* from claim 33 by teaching the use of friction *only* and therefore one reading Williams would not use a mechanical fixing by a continuous downward pressure on a top surface of the uppermost sheet. In Williams, the friction relied on is not a continuous downward pressure on a top surface of the uppermost sheet.

It is noted that the tamping fingers 34 are oscillating and do not remain in continuous contact with the top sheet of the first job during second job page stacking and therefore claim 33 readily distinguishes over these tamping

fingers 34 which oscillate up and down on the last sheet deposited of the second job (not the first job as required by the claim). Claim 33 also recites that the downward pressure *is continuous* during the offset stacking of all of the pages of the second job.

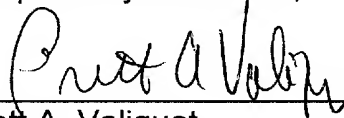
In summary, clearly Williams does not suggest claim 33.

Dependent claims 34-51 all depend from allowable claim 33 and are allowable at least for the reasons noted with respect to claim 33 and also by reciting additional features not suggested.

Independent and generic linking device claim 52 clearly distinguishes at least for the reasons noted with respect to claim 33. Similarly dependent claims 53-63 are all depending from allowable generic claim 52 and are allowable at least for the reasons that claim 52 is allowable and also by reciting additional features not suggested.

The Commissioner is hereby authorized to charge any additional fees which may be required or to credit any overpayment to account no. 501519.

Respectfully submitted,



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Brett A. Valiquet
SCHIFF HARDIN & WAITE
Patent Department
6600 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606
(312) 258-5786
Attorneys for Applicant
CUSTOMER NO. 26574